Fw: Cohen for Congress v. Williams, et al. - Order Drafts

Marion Williams

to:

kcollins@fec.gov 10/04/2014 10:43 PM

Hide Details

From: Marion Williams

To: "kcollins@fec.gov" <kcollins@fec.gov>,

Please respond to Marion Williams

2 Attachments



Order of Recusal 9.25.14.docx Order Dissolving Injunction 9.25.14.docx

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On Friday, September 26, 2014 3:29 PM, Paul Robinson <

> wrote:

Mr. Williams

these are documents.

Paul Robinson

From: janelle@donatilaw.com To: problaw937@hotmail.com

CC: i; Don@donatilaw.com

Subject: Cohen for Congress v. Williams, et al. - Order Drafts

Date: Thu, 25 Sep 2014 19:48:56 +0000

Hi Mr. Robinson,

Please find attached drafts of the Order of Recusal and Order Dissolving Injunction. Please review and let me know your edits/changes.

If you are agreeable, please give me your permission to sign, and I can get these entered ASAP.

Thanks, Janelle

Janelle Crandall Osowski, Attorney
1545 Union Avenue, Memphis, TN 38104
phone 901.278.1004 | fax 901.278.3111 | janelle@donatilaw.com
www.donatilaw.com



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IN THE CIRCUIT COURT OF TENNESSEE FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

COHEN FOR CONGRESS	COMMITTEE	, Petitioner,
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vs.

Case No. CT-003348-14 DIV. III

M. LATROY WILLIAMS, INDIVIDUALLY & D/B/A
"NATIONAL DEMOCRATIC PARTY OF THE USA, INC.",
SHELBY COUNTY DEMOCRATIC CLUB (SCDC),D/B/A
SHELBY COUNTY DEMOCRATIC PARTY, INC. &
MEMPHIS DEMOCRATIC CLUB, INC.

Defendants.

ORDER OF RECUSAL

This cause came to be heard on September 25, 2014, before the Honorable D'Army Bailey, Judge of Division 3 of the Circuit Court of Shelby County, Tennessee.

Pursuant to the request of Petitioner, and for good cause shown, I hereby recuse myself from this matter, and refer this matter to the clerk for re-assignment for all further proceedings.

IT IS SO ORDERED, ADJUDGED, and DECREED:

Hon. D'Army Bailey	 <u></u> _
Date:	

APPROVED FOR ENTRY:

Donald A. Donati – TN Bar #8633 Bryce W. Ashby – TN Bar #26179 Janelle C. Osowski – TN Bar #31359 DONATI LAW, PLLC 1545 Union Avenue Memphis, TN 38104 Telephone: (901) 278-1004

Fax: (901) 278-3111

Email: don@donatilaw.com

Hayden Lait – TN Bar #007711 266 S. Front St. #206 Memphis, TN 38103 Telephone: (901) 527-1301

Attorneys for Petitioner

Paul A. Robinson – TN Bar #14464 5 North Third Street Suite 2000 Memphis, TN 38103 Telephone: (901) 725-7520

Fax: (901) 725-7570

Email: problaw937@hotmail.com

Attorney for Defendants

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing document has been served via email and U.S. Mail on September 25, 2014, on the following

Paul A. Robinson – TN Bar #14464 5 North Third Street Suite 2000 Memphis, TN 38103 Telephone: (901) 725-7520

Fax: (901) 725-7570

Email: problaw937@hotmail.com

IN THE CIRCUIT COURT OF TENNESSEE FOR THE THIRTIETH JUDICIAL DISTRICT AT MEMPHIS

COHEN FOR CONGRESS COMMITTEE, Petitioner,

VS.

Case No. CT-003348-14 DIV. III

M. LATROY WILLIAMS, INDIVIDUALLY & D/B/A
"NATIONAL DEMOCRATIC PARTY OF THE USA, INC.",
SHELBY COUNTY DEMOCRATIC CLUB (SCDC),D/B/A
SHELBY COUNTY DEMOCRATIC PARTY, INC. &
MEMPHIS DEMOCRATIC CLUB, INC.

Defendants.

ORDER TO DISSOLVE TEMPORARY INJUNCTION

This cause came to be heard on September 25, 2014, before the Honorable D'Army Bailey, Judge of Division 3 of the Circuit Court of Shelby County, Tennessee.

On August 25, 2014, during the Parties' initial show cause hearing, the Honorable Karen Williams, who was presiding over the matter at the time, re-set the hearing for September 25, 2014 and granted Petitioner's temporary injunction during the pendency of these proceedings.

Upon request from Defendants and for good cause shown, Petitioner's Temporary Injunction granted on August 25, 2014, is hereby **DISSOLVED**.

IT IS SO ORDERED, ADJUDGED, and DECREED:

	•		
Hon. D'Army Bailey	-	•	 4-
Date:			

APPROVED FOR ENTRY:

Donald A. Donati – TN Bar #8633 Bryce W. Ashby – TN Bar #26179 Janelle C. Osowski – TN Bar #31359 DONATI LAW, PLLC 1545 Union Avenue Memphis, TN 38104 Telephone: (901) 278-1004

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Fax: (901) 725-7570

Email: problaw937@hotmail.com

Attorney for Defendants

Shelby Courty Membris Non-Perfect Coalidior











Kenneth Whelum

Ghayanna Johnson Property Assessor

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National Democratic Party of the U.S.A' Charter# (640511) (Washington D.C.), Address Memphis Location: 3242 Commercial Pkwy Suite 3254, Phone: 901-318-5050: Chairman-Benny, Cohens, Co-Chairman- M.F. Banks, Coordinator-M.LaTroy Williams

East Region-NewYork, NewJersey 123 Armstrong Ave Jersey City NJ 09550 6Chairman-L Alexander Williams, Co-Chair-Mary E.

ANorth Region-Chicago,IL Chairman-Dr. C. Hawkins, Co-Chair- Nathan Edwards Jr.

West Region- Los Angeles California: Chairman-H. Bayley, Co-Chair- L. Carmichael

South Region-Chairman- Dr. James Williams, Co-Chair-Tom Clyborn

Democratic Party of TN (Charter#67722945) Chairman- Barbara C. Cooper, Co-Chair-

William Chism

Shelby County
Democratic Club
Chairman- M.F.
Banks, Co-ChairTyrone Griggs,
Secretary-N.Threatt

Membership-M.
Everette Banks, Mrs.
L. Banks, MLA
Threatt, N. Threatt, L.
Williams, Jackie
Lester, R. Neson,
Tyrone Griggs, Robert
Flowers, Sonie
Bridges, Aurthur
Bailey, Charlotte
Draper

Shelby County Democratic Civil County Democratic

conjunction with Memphis Democratic Club(Charter #67590863),Democratic Coalition(Charter # 67622483)
Democratic Party of TN(Charter #67722935),National Democratic Party of the U.S.A.(Charter #640511)

3240 Commercial Pkwy Sulte 3258 Memphis TN 38116 Phone: 901-318-5285

Dear Sir or Madam;

Please be advised, the Shelby County Democratic Committee has proposed 90% of the candidates that are currently listed on our ballot. However, it is still subject to a 10% change within the next 24 hours. Please read this synopsis carefully:

- 1. The Shelby County Democratic Club will print a total of 110.000 ballots
 - a. 52,000 will be mailed out
 - b. 20,000 will be delivered to churches in Memphis and Shelby County
 - c. 7,000 will be delivered to businesses throughout Memphis and Shelby County
 - d. 5,000 will be delivered to nursing homes and convalesce homes
 - e. 10,000 will be delivered to Memphis City Schools
 - f. 5,000 will be delivered to Shelby County Schools
 - g. 6,000 will be passed out at bus stops and on busses
 - h. 5,000 will be passed out at Memphis and Shelby County cooperations and plants including FedEx, the Post Office, and UPS
- 2. The Memphis Democratic Club will print a total of 56,000 ballots
 - a. 26,000 mailed out
 - b. 8,000 to churches
 - c. 4,000 to businesses
 - d. 2,500 to nursing homes and convalesce homes
 - e. 4,500 to Memphis City Schools
 - f. 3,000 to Shelby County Schools
 - g. 3,000 to bus stops and busses
 - h. 5,000 to Memphis and Shelby County cooperations and plants including FedEx, the Post, and UPS
- 3. The Democratic Coalition will print a total of 43,000 ballots
 - a. 20,000 mailed out
 - b. 8,000 to churches
 - c. 3,000 to businesses
 - d. 3,000 to nursing homes and convalesce homes
 - e. 3,000 to Memphis City Schools
 - f. 2,000 to Shelby County Schools
 - g. 2,000 to bus stops and busses
 - h. 2,000 to Memphis and Shelby County cooperations and plants including FedEx, the Post, and UPS
- 4. The Tennessee Non-Partisan Coalition for Better Government for the People(Charter #67722929) will print a total of 75,000 ballots
 - a. 40,000 mailed out
 - b. 12,000 churches
 - c. 8,000 businesses
 - d. 5,000 to nursing homes and convalesce
 - e. 6,000 to Memphis City Schools

Coordinated by M. LaTroy Williams- (Bringing the Government Back to the People)

Memphis
Democratic Club918 South Pkwy East
Memphis TN 38106
Chairman- Tyrone
Griggs Co-Chairman
Dr. C. Hawkins,
Secretary Vickie
Bridges

Membership- Ronnie Porter, Bill Wilchi, David Morgan, S. Webb, James Harvey, Stacy Walker, Barber Stanton, O. Threatt, Janice White, Tyrone Griggs, Dr. C. Hawkins, Vickie Bridges

Democratic Coalition 2620 Elvis Presley Memphis TN 38114-Chairman Robert Flowers, Co-Chairman- Rev. C. L. Grown, Secretary- C. Draper

Membership- Robert Flowers, Rev. C.L. Grown, Ernest Porter, David Sneed, Wilbert Baker, Tony Pernell, B. Thompson, Kenny Wilson, Li Taylor, Will Washington, Aurthur Ship

- f. 3,000 to Shelby County Schools
- g. 1,000 to bus stops and busses
- 1,000 to Memphis and Shelby County cooperations and plants including FedEx, the Post, and UPS

For a total of 268,000 ballots that will be printed, reaching a household of 994,000 people in Shelby County. The Shelby County Democratic Club will be advertised on News Channel 3, 24, 5, and 13 and radio stations WDIA, 101.1, 95.7 and K97 each day until Election Day. We will also have poll workers working on 14 polls in early voting and on Election Day. The Shelby County Democratic Club has the most effective winning percentage in the United States with 96% elected candidates. For more information and for pricing please contact Bishop Everett Banks at 901-279-3748. PLEASE CALL NO LATER THEN TODAY!

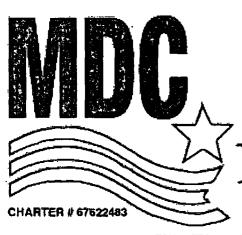
Sincerely,

M.F. Banks Chairmain

TyRone Griggs Co-Chairman

N.Threatt W. Secretary

Coordinated by M. LaTroy Williams- (Bringing the Government Back to the People)

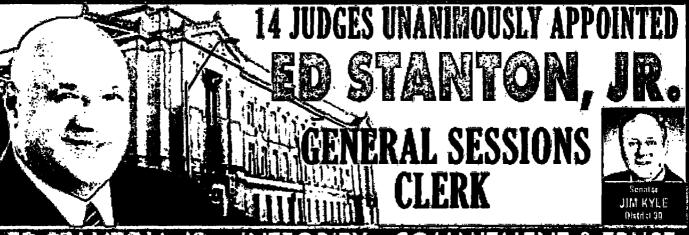






PRESIDENT OBAMA PLEASE VOTE

1995 FOUNDERS: G. GANT AND A. GANT







Representative BARBARA COOPER District 86





District 68 HOOL BOARD COMMISSIO



JOHNNIE TURNER



JOHN DeBERRY



GA HARDAWAY District 03



KEVIN WOODS



TERESA JONES School Brd. Dist. 2



KIM WIRTH School Brd. Dist. 5



REGINALD PORTER, JR. school Brd. Gist. 6



FREDA WILLIAMS School Bril. Dist. 1



CAROL CHUMNEY District Attorney General



TOMEKA HART U.S. Congress 9th District



CHEYENNE JOHNSON Assessor of Property



LET'S KEEP JIM KYLE - A MAN OF IMPECCABLE INTEGRITY!



Senator



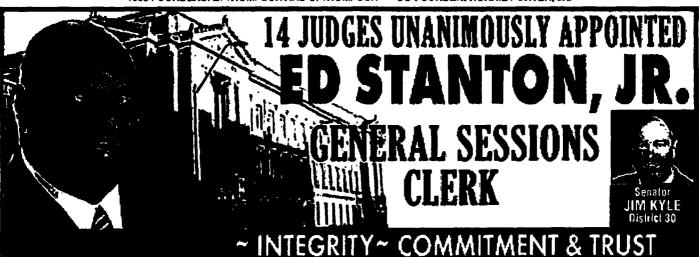
STEVE COHEN President



CHARTER # 67622483

1998 FOUNDERS: B. THOMPSON AND C. THOMPSON

CO-FOUNDER: RONNIE PORTER, JR.





CAROL CHUMNEY **District Attorney General**



STEVE COHEN U.S. Representative 9th District

HOUSE OF REPRESENTATIVES



CHEYENNE JOHNSON Assessor of Property



Regrosestative JOE TOWNS District 84



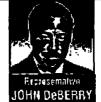












Regresemative GA HARDAWAY District 93

SCHOOL BOARD COMMISSION



KEVIN WOODS Setiool Bid. Dist. 4



TERES.4 JONES Steast Brd. Etal. 2



KIM School Brd. Dist. 5



REGINALD School Brd. Bist. B



FREDA Robool Brd. Esst. 1 OFFICIAL BALLOT: EARLY VOTING TURY

SHELBY COUN



1978 Co-Founder: M. LeTroy Williams 1978 Feunder: Meivin Robinson, Sr., A.W. Wills, Benjamin Hooks, Vesco Smith, Odell Horton, Dr. Bisir T. Hunt A. Mesco Welker, Jesse Turner, Sr.

64 YEARS, SHELBY COUNTY BEMOCRATIC CLUB HAS ELECTED DEMOCRATS WHO HAVE BECOME LEGENDS. HELP CONTINUE THE LEGACY



















U.S. Congress

9th District

Assessor of Property

JIM KYLE Senator

District 30

CHEYENNE NOSNHOP



ntegrity ~ Commitment & Trust Ş

ERAL SESSION

CLERK





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ILLIAMS FREDA

Professional State Comments and Comments of the State of

School Bra. Dist. ?

School 912, Dixt, 4

LET'S KEEP

ED STANTON, JIM KYLES, CHEYENNE JOHNSON, FREDA WILLIAMS, G.A. HARDAWAY & KENNETH WHALUM

"The Read Alead..." From President Barack Obama

Dear Marion LaTroy Williams, Once again, I call upon you for your support to help get the vote out for 2012. Please double your efforts.

PRESIDENT BARACK OBAMA



Marion Laffray Williams 3250 Commercial Pkwy Memphis 72 38116 test enoughtus cuma up a catal of page's : "Nes wa cen: Today, wa tao all ming thei essafus Inch, a built overy general on a cabat to nodes covarior deel, that we are not a raiden that essaba 1570. And we have now just crestimed - as seen LCD Les that was earn into with respond with the later back its appraisons. We ground a major fool last icsi, Wo are rist a rector that does white rasy. That's not who we cre. That's not now we got body arou'd have some buce accurry when a connects that has health con Ending this was not they to change manual We don't lad provide the first class of the case propose that every

our interests and stand by our man. And the man only in books retains—as in our own., The United States has paid a huge price to put the halo's of inspirit the funde of its people... How, its time to tern the page. Indeed, one of the featons staying the world is no a hinchor of motory force abore, We must use all elements of our power excluding our diplomacy, our occurant ethergit, and the power of America's arangsto—to secure canouthri manamy test o test or testioners U, 9. GONG PE66 NTH DETRICT REPRESENTATIVE G.A. HARDAWAY DETRICT 13 CAPOL CHUMNEY
OSTRICT
ATTORNEY OBJESAL JIM KYLE DISTRICT X THE REPORT OF THE PARTY OF THE BARACK OBAMA

ther brainty or their and, no matter their years of execution to passes the temper will their of thousands of America in under the called their secutory that they have no the right to have been an executed the called they have no the right of their secutory that they have no the right of their their when an experiment of their secutors are partied. We use a rectanished who called a secutory parties. We use a rectanish that webenness the secutors that at more and wanter and secutors the death that generation have longer occebites of our lime, he tenger with automathy be derest the correct of thousands of political Americans who were forced to leave the military regardless of their state, no matter protest a vision of the fidure that's besidency and fiest on our lesse, but also on our hopest a vision that cooperates the residency of the cooperate first course that when the world, but also the britishess in. These ere the ideals that we uphold today.

The Proof of French

We will move leaved against, a not at all- for the checkages we take about the party and bigger than politice. At state that now is not set a whether we called its whether we realise the health now is not people to remarked. Its whether we called the health that has noted America at a pince on the man, but a light to the work.

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President Burnt, Oburn

PRISTE STD USPUSIAGE

PAID

PERMITING, 9711 MEMPINS, TN

3250 Commercial Pkwy, Ste. 3258 Monsphis, TN 38116

The Shelby County Democratic Club